

DOE ORDER # 5400.1  
94-RF-04073

## EG&amp;G ROCKY FLATS

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EG&amp;G ROCKY FLATS, INC.

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April 7, 1994

94-RF-04073

William Fitch  
Environmental Restoration Management  
DOE/RFOPAST DUE REGULATORY AGENCY COMMENTS ON THE OPERABLE UNIT (OU) 15 FIELD  
SAMPLING PLAN TECHNICAL MEMORANDUM (TM) 1 - DLS -012-94

The purpose of this letter is inform the Department of Energy/Rocky Flats Office (DOE/RFO) of the negative impact that the delay of receipt of official comments on TM 1 from the Colorado Department of Health (CDH) and the United States Environmental Protection Agency (EPA) may have on the schedule for OU 15. EG&G Rocky Flats, Inc. transmitted draft TM 1 to DOE on February 22, 1994 for concurrent review with EPA, DOE and CDH. Official (signed) comments regarding draft TM 1, which were scheduled to be provided to EG&G on or before March 15, 1994 have not yet been received by EG&G. However, unofficial (unsigned) comments on TM 1 have been received from DOE/Headquarters, DOE/RFO, and CDH. Unofficial comments were provided from CDH and EPA via facsimile and verbally during a meeting held with DOE, EPA and EG&G on March 17, 1994. Draft meeting minutes from the March 17, 1994 meeting have been attached for DOE's transmittal to EPA and CDH for review and/or approval. In order to prevent a negative impact to the schedule for OU 15, official comments must be received from the regulators no later than April 15, 1994 to allow completion of TM 1 by May 2, 1994.

TM 1 defines the scope of verification sampling which will be required to complete the Phase I RFI/RI for OU 15. Based on CDH's unofficial comments, EG&G has taken appropriate action to prepare for and accelerate verification sampling and associated chemical analyses. Verification sampling is currently scheduled to begin on May 9, 1994 (within one week of TM 1 completion). Initiating verification sampling without completion of TM 1 may result in the generation of unnecessary costs and low level/mixed waste.

The verification sampling analytical results will not be available for evaluation and inclusion within the draft Phase I RFI/RI ([Resource Conservation and Recovery Act] Facility Investigation/Remedial Investigation) Report for OU 15 (Interagency Agreement Table 6 Milestone due date: August 1, 1994) unless the following assumptions are correct:

1. Concurrent reviews of the draft Phase I RFI/RI Report for OU 15 will be conducted by DOE, EPA and CDH;
2. CDH's official (i.e., signed) comments on TM 1 will not be significantly different from their unofficial (i.e., unsigned) comments on TM 1;

AUTHORIZED CLASSIFIER  
SIGNATURE  
CLASSIFICATION REVIEW  
REVIEWER PER CLASSIFICATION OFFICE

REPLY TO RFP CC NO:

ACTION ITEM STATUS

OPEN ☐ CLOSED ☐  
☐ PARTIAL

TR APPROVALS:

SIGNATOR &amp; TYPIST INITIALS

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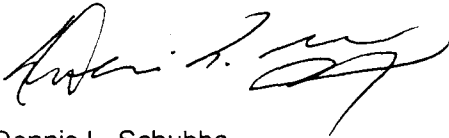
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BY	C. T. GUSTICK
DATE	4-17-95

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3. EPA's comments, when received, will be in agreement with CDH's unofficial comments and will not significantly impact the scope of verification sampling; and
4. Verification sampling chemical analysis results must be received prior to June 28, 1994 in order for the results to be included within the draft Phase I RFI/RI Report for OU 15.

EG&G recommends that the CDH and EPA be notified of the potential negative impact that their delay of official comment on TM 1 may have on the availability of verification sampling results for inclusion within the draft Phase I RFI/RI Report for OU 15. Additionally, EG&G recommends that another meeting be held as soon as possible with EPA, CDH, DOE and EG&G to discuss the scope of verification sampling with regard to demonstration of OU 15 IHSSs meeting both RCRA and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) clean closure performance standards.

If you have questions regarding this correspondence, please contact me at telephone extension 8709.



Dennis L. Schubbe  
Operable Unit 15 Project Manager  
Remediation Project Management  
EG&G Rocky Flats, Inc.

jlm

Orig. and 1 cc – W. Fitch

Attachment:  
As Stated

cc:  
J. M. Roberson – DOE/RFO

To: Distribution

From: Susan A. Walter

Date: March 21, 1994

Meeting Date: March 17, 1994

Subject: Meeting Minutes for OU15 Phase I RFI/RI

Attendees: Peter Bierbaum (ERM) Wayne Roth-Nelson (ICF)  
Bill Fitch (DOE) Dennis Schubbe (EG&G)  
R. Hyland (DOE) Jeff Swanson (CDH)  
Dave Maxwell (EPA) Susan Walter (ERM)  
Steven Needler (EG&G)

## 1. Introduction

Mr. Dennis Schubbe began the meeting with some introductory remarks. The primary purpose of the meeting was to discuss the organization of the OU15 Phase I RFI/RI Technical Memorandum Number 1 (TM#1) and the coordination/resolution of comments. Mr. Bill Fitch suggested that we consider a modified format for the report.

## 2. Clean Closure Performance Standards

Mr. Jeff Swanson identified two major issues related to OU15 TM#1. Mr. Swanson indicated that for purposes of addressing RCRA concerns each IHSS must meet the clean closure standard. Mr. Swanson indicated that we are meeting clean closure performance standards and that the standards are different for treatment areas and drum storage areas. No RCRA listed wastes were revealed during the sampling of the chip roaster and the fume hood. Mr. Swanson suggested that the facility may want to explore releasing the hood for further use by writing a letter that explains how the clean closure standards have been met. Mr. Dave Maxwell stated that the radiation portion of the performance standard should be consistent with plant-wide radiation decontamination standards; however, plant-wide standards have not yet been defined. With regards to the hood for economic development, CERCLA does not have a concern with reuse of the hood in the same spot. Mr. Fitch asked that the issue of renegotiation of the IAG be left out of the discussion of TM#1 and that we focus on the existing agreement and rules.

Both the EPA and the DOE are concerned with the outcome of OU15 being consistent with the RCRA Permit for RFP and economic development.

The DOE clearly does not want the fume hood to get wrapped up in plant-wide radiation standards. It is certified clean and can be clean closed. Mr. Fitch requested that a letter be sent to the DOE stating that the fume hood is clean with respect to radiation.

Mr. Swanson next defined the requirements to meet clean closure. The clean closure standard specified in the June 25, 1993 Permit will be applied to OU15 for consistency. This means that hazardous waste constituents must be below detection, that TC metals must be at or below unused rinsate concentrations, and that the rinsate can not exhibit a hazardous characteristic. It was noted that phthalates and metals were detected.

In addition, we need true equipment blanks. Concentrations in the rinsates may be due to contamination from the equipment hoses. We should collect equipment blanks and compare our rinsate values with these blanks. We should eliminate any samples with concentrations that are comparable to those concentrations found in the blanks. These levels probably are not coming from the IHSS. Any sample that exceeds the equipment blank will be evaluated for likelihood of presence in the IHSS. Any sample that has constituents which were likely to be found at the IHSS will be evaluated further, and will be subject to verification sampling.

Everyone in attendance agreed that we need a reasonable list of hazardous constituents. The Appendix VIII list should be narrowed to be consistent with the OU15 Phase I RFI/RI Work Plan. We should check the Work Plan and see specifically which constituents were defined. If a constituent on the Work Plan list is detected in a rinsate sample, and the constituent is also on the Appendix VIII list, then we must conduct additional evaluation.

### 3. IHSS vs. Pathway

Mr. Schubbe questioned the accuracy of the regulatory scope and stated that the pathway should not be considered part of the IHSS. It was further stated that the information presented in TM#1 does not indicate that any contamination left the IHSS and therefore, we should not have to do any work outside the IHSS.

Mr. Swanson stated that with regards to RCRA clean closure we need to focus only on the IHSS, and that the pathway issues belonged to CERCLA. Mr. Maxwell replied that the pathway was a CERCLA issue, but that under RCRA, it would be a corrective action requirement.

It was agreed that the two stages of sampling data will be separated.

#### 4. The Beryllium Issue

Everyone expressed concern for whether beryllium (Be) dust was entering the IHSS. Additionally, once the IHSSs have been cleaned, how will RFP prevent additional Be dust from entering the area?

Mr. Fitch stated that other RFP sites were trying to meet the OSHA Threshold Limit Value for Be of 25 ug/m<sup>3</sup>. Since the facility is already operating under OSHA requirements, it should not be difficult to meet this limit. We are not likely to exceed this value with any of our data points. Mr. Swanson indicated that Be is not a RCRA closure problem. Like radiation, Be falls under CERCLA. Again, Be at OU15 must be handled consistently with Be in other facilities across the RFP.

Mr. Fitch further stated that the DOE was only cleaning up those parts of buildings where workers are likely (or actually) working. These areas are being cleaned based on the OSHA health and safety standards.

#### 5. Additional Characterization

Mr. Swanson suggested that any areas remaining with detects in the rinsates be triple rinsed and resampled.

Mr. Peter Bierbaum stated that we should design our additional sampling to satisfy Data Quality Objectives (DQOs), namely statistical defensibility considerations.

Mr. Swanson said it was not necessary to design a sampling program based on statistics, but instead suggested that we make logical arguments for any constituents detected that might be present in background or equipment. Mr. Steven Needler suggested we use the existing CERCLA guidelines for evaluating sample data.

Mr. Maxwell wanted us to look at the final data (after data validation) and maybe more detects could be eliminated based on the validation.

#### 6. CDH Comments

Mr. Jeff Swanson provided the following comments for consideration. The formal comments from CDH are forthcoming.

1. The results tables in Section 3.0 do not agree with the RFEDS data set.

# DRAFT

2. In our analyses for risk characterization, we looked only at the "real" samples. What about duplicates? We should provide our justification for not looking at any of the additional samples.
3. Did we meet our DQOs? Did our data meet the QA/QC requirements from the Work Plan?
4. Eliminate any references to a baseline risk assessment. We do not want to be held accountable to the assumptions, parameters, etc., which are implied when dealing with a baseline risk assessment.
5. Check the decision tree. Does the screening level section really need to remain?
6. Separate TM#1 from the baseline risk assessment.
7. There is no text discussing detection limits. We should provide discussion about the detection limits and show if they are in agreement with what is in the Work Plan.

Mr. Maxwell suggested that it may be worth considering application of the debris rule treatment standards to certain clean closure situations as previously proposed by Mr. Bierbaum. Mr. Bierbaum then summarized the concept.

In conclusion, it was restated that we need to remain consistent with the RCRA Permit and economic development.